

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 1:20-CR-5(9)
	§	
TINA GILDER	§	

**MOTION AND BRIEF FOR ISSUANCE OF
A PRELIMINARY ORDER OF FORFEITURE**

The United States Attorney for the Eastern District of Texas, by its undersigned Assistant United States Attorney, respectfully submits this Motion and Brief for Issuance of a Preliminary Order of Forfeiture in the above-styled case. In support of, the United States sets forth the following:

1. A First Superseding Indictment was filed against the above-captioned defendant charging violations of 21 U.S.C. § 846 and 18 U.S.C. § 1956(h).
2. A notice of intention to seek criminal forfeiture pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 982(a)(1) was included within the indictment seeking the forfeiture of defendant's interest in the following:

Cash Proceeds:

A sum of money equal to \$100,000.00 in United States currency and all interest and proceeds traceable thereto, representing the amount of proceeds obtained by the defendant as a result of the offense alleged in Count One of the first superseding indictment, which charged a violation of 21 U.S.C. § 846 and 21 U.S.C. § 841(a)(1), Conspiracy to possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, for which the defendant is personally liable.

3. On February 24, 2022, the defendant was tried and found guilty of Count One of the First Superseding Indictment which charged violations of 21 U.S.C. § 846 and 21 U.S.C. § 841(a)(1).

Accordingly, the defendant's interest in the aforementioned property is forfeited pursuant to 21 U.S.C. § 853.

4. Because the forfeiture order will consist only of the forfeiture of cash proceeds obtained by the defendant, no ancillary proceeding will be required to adjudicate the interests of third parties in the forfeited property, pursuant to Rule 32.2(c)(1).

5. The United States respectfully requests the entry of a Preliminary Order of Forfeiture as proposed in the attached order consisting of the forfeiture of a cash sum equal to \$100,000.00 from the defendant, such sum being property constituting, or derived from, proceeds obtained by the defendant, as the result of the offense alleged in the indictment, for which the defendant is personally liable.

Respectfully submitted,

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UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I certify that the foregoing instrument has been served on counsel for the defendant via CM/ECF system on March 2, 2022.

CERTIFICATE OF CONFERENCE

I have conferred with counsel of record for defendant regarding the merits of this motion. The motion is UNOPPOSED.

/s/ Michael A. Anderson
MICHAEL A. ANDERSON
Assistant United States Attorney